# GAS PIPELINE SAFETY DIVISION NEWSLETTER

February 2007

# TRA GAS PIPELINE SAFETY DIVISION MOVING FORWARD

Happy New Year from the TRA Gas Pipeline Safety Division staff!

Since our last newsletter several changes have taken place within the division. A number of our staff members have gone on to pursue other endeavors. First of all, Vicky Nelson moved one floor to become executive administrative assistant for TRA Director Dr. Eddie Roberson. Vicky worked with us for about 9 years and was a tremendous asset to our division. Brad Williams worked in our division for over 9 years.

# "The only constant is change"

Real estate, initially a hobby for Brad, has developed into a full time enterprise. Glynn Blanton has taken a new position with the Federal Pipeline and Hazardous Material Safety Administration. His new role as state evaluator will take him to state pipeline safety



Gas Safety Pipeline Div. Staff. L to R: Clift Phillips, Larry Borum, Eric Cherry, & Tom Woosley.

programs across the country to evaluate and recommend improvements to state programs. Glynn reports to Washington, D.C., but has the benefit of maintaining his residence near Nashville. We wish Glynn, Vicky, and Brad the best in their new pursuits.

Through the years markets change, personnel change, and regulations change. The only constant that seems to remain is change itself. The Gas Pipeline Safety staff members are dedicated to adapting these to changes and continue to serve the citizens of our state to the best of our abilities.

The current staff, Larry Borum, Eric Cherry, Clift Phillips and Tom Woosley, are working together to be of service to each operator throughout the state. For 2007, each inspector will retain the previous year's operator inspection list with the addition of a portion of those previously assigned to Brad in 2006. A listing operator/inspector assignments for 2007 may be found on the last page of this newsletter. Our contact information is also provided on that same page. If you are unable to contact us in the office feel free to call our cell phones.

The chief position vacancy, formerly held by Glynn, has been posted on the TRA website. If there is anyone interested in becoming the next Chief of the Gas Pipeline Safety Division, information about the job and how to apply appears on the website. Information may be obtained through this web link: <a href="http://www.state.tn.us/tra/employment.htm">http://www.state.tn.us/tra/employment.htm</a>.

#### Also in this edition:

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2007 Operator/Inspector List



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The mission of the **Tennessee Regulatory Authority** is to promote the public interest by balancing the interests of utility consumers and providers while facilitating the transition to a more competitive environment.

# Regulator and Relief Valves

October brought an increased inspection effort on the part of the GPSD staff, who were asked to schedule inspections for four days each week. This additional time in the field allowed inspectors to expand their inspection topics. During specialized inspections focusing on regulators and relief valves and standard inspections, the inspector reviews operator inspection reports to verify that appropriate information is available. One critical area of concern is the information recorded on the relative capacities of regulators and relief valves.

Based on §192.199, §192.201 of Subpart D and §192.743 of Subpart M of the Minimum Federal Safety Standards (MFSS) for code information addressing the design and maintenance of pressure relief and regulating stations, inspectors are responsible for insuring the availability of records verifying the operator has performed calculations or physical tests to determine regulator and relief valve capacities. Therefore, the inspection staff does not normally perform calculations to verify operator-determined capacities. During a recent regulator, relief



valve and odorization inspection, the operator raised some questions relative to regulator/relief valve capacity determinations. After researching specifications and operating characteristics of a particular requlator and relief valve installation from the operator's system, the inspector was able to provide the operator with an example of a regulator/relief valve capacity evaluation based on the inspector's interpretation of data and to review this information with the operator during a subsequent inspection.

Since reviewing the initial regulator and relief valve installation, selected inspection reports of additional operators have been reviewed and the resulting information provided. Such exercises do not serve as the operator's

review and calculation for regulator stations in his/her system and such a review is performed for the purpose of refocusing the attention of the operator and inspector on the importance of the regulator and relief valve relationship. Operators' qualified personnel or consultant must continue to perform this task. According to §192.743, after the initial calculations, subsequent calculations need not be made if the annual review documents that parameters have not changed to cause the rated or experimentally determined relieving capacity to be insufficient. Each operator is responsible for insuring that relief valves function as intended and that inspection reports are accurate.



Please start reviewing your system for customers who meet the above definition. If you have questions on this issue please contact your inspector.

## **Master Meter**

Our office has recently received several questions about master meter operators.

The GPSD will be surveying each operator this year to determine if there are any master meter operators on their system. As a reminder, 49 CFR §191.3 defines a master meter System as: a pipeline system for distributing gas within, but not limited to, a definable area, such as a mobile home park,

housing project, or apartment complex, where the operator purchases metered gas from an outside source for resale through a distribution pipeline system. The gas distribution pipeline system supplies the ultimate consumer who either purchases the gas directly through a meter or by other means, such as by rents.

# Public Awareness

Public Awareness has been a hot topic for the past several months and this article will explain how evaluations will be handled and discuss several areas of concern that have been identified with the first round of evaluations. First, each gas distribution operator should have already submitted Public Awareness Program plan to the Public Awareness Program Clearinghouse. If you have not done so, please contact our office as soon as possible.

After submitting your plan to the clearinghouse, they will evaluate it and determine if it meets the RP 1162 criteria. The clearinghouse will notify our office upon completion, and if you are lucky (as many of you have already found out) they will send along their findings that deviate from RP 1162. Our office will meet with you to discuss these deviations and identify changes that need to be made to the plan. If changes are made, the operator is

not required to resubmit the Public Awareness Plan to the clearinghouse.

Our office has already received responses from the clearinghouse and has performed associated inspections. During these inspections, a trend of deviations from RP 1162 has become apparent. The following are a few of the most cited deviations:

- 1. Have a "Management Statement of Support." Management should demonstrate its support through company policy, management participation, and allocation of resources and funding. The program should state management's support measures.
- 2. Specifically state the delivery methods for each stakeholder. Remove all 'or' statements from the delivery method list. If the delivery methods change, then you can change your plan.

3. The operator should state the process and procedures for supplemental activity. The operator should state when supplemental activity will be performed (i.e. third party damages, pre-construction meetings, known digging on facilities without One-Call Ticket, etc.)

Find more information on public awareness and a link to the RP1162 document at http://primis.phmsa.dot.gov/comm/PublicEducation.htm. Each operator should have a copy of RP 1162 and should have used this document to develop Public Awareness Programs.

RP 1162 is vital to developing and understanding your Public Awareness Program.

## Updates & Reminders

Federal form RSPA F7100.1-1 (Annual Report) is due to OPS by March 15. You can file online using the Online Data Entry System link located at www.ops.dot.gov. Be sure to send a copy to the TRA Gas Safety office by April 1.

The minimum annual percentage rate for random drug testing remains at 25 percent of covered employees. (Effective Jan. 1 through Dec. 31, 2007.)

### Excess Flow Valves

We have been hearing about the possibility of mandatory installation of excess flow valves for a while now. The day has now come. Excess flow valves are now mandatory on all new and renewing services effective June 1, 2008.

Some operators have elected to place excess flow valves on high pressure farm tap services in recent years, thereby minimizing that potential for risk to the public and property. The forthcoming distribution integrity management rule has been delayed to incorporate language addressing this new excess flow valve requirement. The

distribution integrity management rule is still expected toward the middle of 2007. The rule will address managing the risks within gas distribution systems. This will require a good working knowledge of the gas system and each of the components in the gas system, including excess flow valves.

Excess flow valves have now demonstrated a good and reliable track record without false closures. One primary consideration is sizing the excess flow valve correctly for the load the customer will require.

If a customer arbitrarily



elects to install a pool heater, the excess flow valve for the service will most likely need to be upgraded to account for the additional load and thereby prevent the possibility of false closures. The excess flow valve is an additional safety measure, and when used properly may prevent accidents. Small leaks and flows not exceeding the design limits still pose potential threats and will require ongoing vigilance in the operation and maintenance of your gas system. Thank you for your cooperation concerning natural gas pipeline safety.

#### **Private**

Atmos Energy Bristol - Borum Columbia - Phillips Franklin - Woosley Greeneville - Borum Johnson City - Woosley Kingsport - Woosley Maryville - Cherry Morristown - Cherry Murfreesboro - Phillips Shelbyville - Woosley Union City - Cherry Chattanooga - Phillips Chattanooga (Clev) -Woosley Counce - Cherry GASCO(Jellico) - Phillips GASCO (Byrdstown) -Borum Hartsville - Phillips Nashville Gas - Phillips Red Boiling Sprs - Borum

#### **Municipal**

Adamsville - Cherry Athens - Woosley Athens (Ardmore) -Borum Bells - Cherry Bolivar- Cherry Brownsville- Phillips Centerville - Woosley Clarksville - Woosley Clifton - Phillips Collinwood - Borum Cookeville - Woosley Covington - Phillips Dickson - Phillips Dunlap - Phillips Dyersburg - Phillips Englewood - Borum Etowah - Borum Fayetteville - Phillips Ft. Campbell - Woosley Friendship - Cherry Gainesboro - Cherry Gallatin - Phillips Gallaway - Phillips Halls - Cherry Harriman - Borum Henderson - Borum Henning - Woosley Hohenwald - Woosley Humboldt - Woosley Jackson - Woosley Jamestown - Borum Knoxville - Phillips Lafayette - Phillips Lawrenceburg - Cherry Lebanon - Cherry

Martin - Phillips Mason - Woosley Maury City - Cherry Memphis - Woosley Monteagle - Cherry Mt. Pleasant - Borum Munford - Cherry Newbern - Borum Obion - Borum Parsons - Borum Pikeville - Borum Portland - Cherry Pulaski - Borum Ridgetop - Woosley Ripley - Borum Rockwood - Phillips Savannah - Phillips Selmer- Phillips Smyrna - Woosley Somerville - Phillips South Fulton - Cherry Springfield - Borum St. Joseph - Borum Sweetwater - Woosley Trimble - Borum Troy - Borum Waynesboro - Cherry

#### **Utility District**

Bedford County - Borum Citizens Gas - Borum Claiborne Co. - Woosley Clay Gas - Woosley Crockett Public - Borum Elk River Public - Borum Gibson County - Woosley Hardeman/Fayette -Woosley Hawkins County - Phillips Horton Highway - Cherry Humphreys Co. - Cherry Jefferson-Cocke - Woosley Lake County - Borum Middle Tennessee Gas Crossville - Cherry Dayton - Phillips McMinnville - Woosley Smithville - Phillips Sparta - Cherry Oak Ridge - Borum Paris/Henry Co. - Phillips Poplar Grove - Borum Powell/Clinch - Cherry Powell Valley - Cherry Sevier County - Woosley Tipton Co., First - Cherry Unicoi County - Woosley Upper Cumb. - Phillips

West TN Public - Borum

Volunteer Energy - Phillips

#### **Housing Authority**

Columbia - Woosley Covington - Woosley Gallatin - Cherry Harriman - Borum Hartsville - Cherry Huntingdon - Borum Jackson - Borum Jefferson City - Borum Lawrenceburg - Phillips Lebanon - Borum Livingston - Cherry Martin - Phillips McKenzie - Cherry Memphis - Woosley Metro Dev/Hous. -Woosley Murfreesboro - Borum Parsons/Decatur - Phillips Portland - Borum South Pittsburg - Cherry Tullahoma - Cherry Union City - Phillips

#### **Apartment**

Alexian Village - Woosley Avalon West - Cherry Georgetown - Cherry Green Hills Terr. - Borum Johnson Bible - Cherry Kirby Pines Est. - Woosley Maple Village - Phillips Pentad (Crestview) -Phillips Pentad (Hill.& Pkwy) - Phillips Sequoyah Sq. - Phillips Rose Garden - Borum

#### **Mobile Home Park**

Fern Creek - Borum Old Trinity - Cherry

#### **Intrastate Pipeline**

Clear Creek - Phillips Coalfield - Cherry COPCO - Woosley ESG Pipeline - Woosley Evan Energy - Borum Fentress Gas - Cherry TENGASCO - Cherry Titan Energy - Borum

#### **Direct Sale**

AcuPowder - Phillips AFG (Church Hill) - Woosley AFG (Kingsport) - Cherry AOC - Woosley ALCOA - Woosley

Bowater - Woosley Dept. of Energy - Borum Eastman Chem. - Woosley General Shale - Cherry Holston (Kingsport) - Cherry Holston (Mt. Carmel) -**Phillips** MD Recycling - Woosley Occidental Chem. - Borum Olin Corporation - Phillips Smelter - Phillips Solutia - Phillips Tenneco Pkg. - Cherry TN Air Ntl. Gd. - Cherry TVA (Gallatin) - Woosley TVA (New J'ville) - Borum TVA (Lagoon Crk) -Woosley Turney Center - Borum UCAR - Borum Weyerhaeuser - Phillips

#### **LNG**

Nashville (Bordeaux) -Phillips Memphis (Arl.) - Borum Memphis (Caple.) -Woosley

#### EMERGENCY CONTACT LIST

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